

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgonson@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MAY 4, 2022 AT 10:00 A.M.**

*Parties are directed to <https://www.njb.uscourts.gov/LTL>
for appearing via Court-Solutions or in-person, or observing via zoom*

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² Amended agenda items appear in bold.

MATTERS NOT GOING FORWARD

1. Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims [Dkt. 8].

Status: This matter has been adjourned to the June 14, 2022 hearing.

2. Debtor's Motion for an Order (A) Authorizing the Filing Under Seal of Certain Confidential Commercial Information in Connection with the Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims and (B) if Necessary, In Camera Hearing [Dkt. 9].

Status: This matter has been adjourned to the June 14, 2022 hearing.

3. Application of the Official Committee of Talc Claimants for Retention of Houlihan Lokey Capital, Inc. as Investment Banker Under Bankruptcy Code Section 328(a) Effective as of December 17, 2021 [Dkt. 953].

Status: This matter has been adjourned to the May 24, 2022 hearing.

4. Application of the Official Committee of Talc Claimants for Retention of FTI Consulting, Inc. as Financial Advisor Effective December 13, 2021 [Dkt. 954].

Status: This matter has been adjourned to the May 24, 2022 hearing.

5. Kirk Williams Motion for Qualified Settlement Fund [Dkt. 1932].

Status: This matter has been adjourned to the June 14, 2022 hearing.

6. Amended Interim Order Authorizing retention of The Brattle Group, Inc. as Talc Consultants to the Official Committee of Talc Claimants I [Dkt. 2124].

Status: This matter has been adjourned to the May 24, 2022 hearing.

CONTESTED MATTERS GOING FORWARD

7. Travelers Casualty and Surety Company's Motion for an Order Adding Travelers as a Mediation Party or, in the Alternative, Modifying the Mediation Order [Dkt. 1900] (the "Travelers' Motion").

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Order Establishing Mediation Protocol [Dkt. 1780] (the "Mediation Protocol").

- B. Travelers Casualty and Surety Company's Motion to Seal the Memorandum of Law in Support of Travelers' Motion for an Order Adding Travelers as a Mediation Party or, in the Alternative, Modifying the Mediation Order and Certain Accompanying Exhibits [Dkt. 1901] (the "Travelers' Motion to Seal").
- C. Application for Order Shortening Time [Dkt. 1902].
- D. Century Insurers' Joinder to the Travelers' Motion [Dkt. 1903].
- E. Order Shortening Time Period for Notice, Setting Hearing and Limited Notice [Dkt. 1905].
- F. Corrected Order Shortening Time Period for Notice, Setting Hearing and Limited Notice [Dkt. 1919].
- G. Republic Indemnity of America's Joinder to the Travelers' Motion [Dkt. 1956].
- H. New Jersey Coverage Action Plaintiff-Insurers' Joinder to the Travelers' Motion [Dkt. 1959].
- I. Arrowood Indemnity Company's Joinder to the Travelers' Motion [Dkt. 1985].
- J. Allianz Insurers' Joinder to the Travelers' Motion [Dkt. 1998].
- K. Allstate Insurance Company, Solely as Successor in Interest to Northbrook Excess & Surplus Insurance Company, Formerly Northbrook Insurance Company's, Limited Joinder to the Travelers' Motion [Dkt. 2005].
- L. Sentry Insurance Company as Assumptive Reinsurer of Great Southwest Fire Insurance Company Joinder to the Travelers' Motion [Dkt. 2025].
- M. DiSanto Canadian Class Action Plaintiffs' Joinder to the Travelers' Motion [Dkt. 2027] (the "DiSanto Motion").
- N. TIG Insurance Company and Everest Reinsurance Company Joinder to the Travelers' Motion [Dkt. 2052].
- O. Baker Canadian Class Action Claimants' Objection to the DiSanto Motion [Dkt. 2175].
- P. Official Committee of Talc Claimants Limited Objection to the DiSanto Motion [Dkt. 2180].
- Q. United States Trustee Objection to Travelers' Motion to Seal [Dkt. 2183].
- R. Debtor's Reservation of Rights With Respect to Motions Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 2185] (the "Debtor's ROR").

- S. **Travelers Casualty and Surety Company Reply in Further Support of Travelers Motion to Seal [Dkt. 2216] (the “Travelers Motion to Seal Reply”).**
- T. **DiSanto Canadian Class Action Plaintiffs’ May 3, 2022 Letter to the Court [Dkt. 2221] (the “DiSanto Letter”).**

Objections Received: None.

- 8. Travelers’ Motion to Seal.

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. The Travelers’ Motion.
- B. **The Travelers Motion to Seal Reply.**

Objections Received:

- C. United States Trustee Objection to Travelers’ Motion to Seal [Dkt. 2183].
- 9. United States Trustee’s Motion Pursuant to Fed. R. Bank. 9023 and 9024 Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 1912].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. The Mediation Protocol.
- B. Application for Order Shortening Time [Dkt. 1913].
- C. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1920].
- D. The Debtor’s ROR.
- E. The DiSanto Motion.
- F. Baker Canadian Class Action Claimants’ Objection to the DiSanto Motion [Dkt. 2175].
- G. **The DiSanto Letter.**

Objections: None.

10. Ad Hoc Committee of States Holding Consumer Protection Claims Seeking Relief With Respect to the Order Establishing Mediation Protocol [Dkt. 1939].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. The Mediation Protocol.
- B. Application for Order Shortening Time [Dkt. 1941].
- C. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1943].
- D. The Debtor's ROR.

Objections: None.

11. Claimant Shirleeta Ellison's Motion for an Order Appointing Ms. Ellison to the Official Committee of Talc Claimants [Dkt. 1963].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 1968].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 1969].
- C. Supplemental Motion of Claimant Shirleeta Ellison for Modification of the Official Committee of Talc Claimants [Dkt. 2128].

Objections:

- D. Response of the United States Trustee to the Various Motions for Appointment to the Official Committee of Talc Claimants [Dkt. 2062] (the "UST Response").
- E. Objection of Mesothelioma Plaintiffs Represented by Kazan, McClain, Satterley & Greenwood to Motion of Claimant Shirleeta Ellison for Appointment to the Official Committee of Talc Claimants [Dkt. 2070].

- F. Debtor's Preliminary Response to Motions to Alter Membership of the Official Committee of Talc Claimants [Dkt. 2071] (the "Debtor's Response").
 - G. Response and Statement of the Official Committee of Talc Claimants to Committee Membership Related Motions Set for May 4, 2022 Hearing [Dkt. 2182] (the "TCC Response").
 - H. Debtor's Supplemental Response to Motions to Alter Membership of the Official Committee of Talc Claimants [Dkt. 2184] (the "Debtor's Supplemental Response").
12. Claimant Brandi Carl's Motion for an Order Appointing Ms. Carl to the Official Committee of Talc Claimants [Dkt. 2018].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2019].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2021].
- C. Supplement to Motion of Claimant Brandi Carl Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2126].

Objections Received:

- D. The UST Response.
 - E. The Debtor's Response.
 - F. Objection of Maune Raichle Hartley French & Mudd, LLC, to Motion of Certain Ovarian Cancer Claimants for Appointment to the Official Committee of Talc Claimants [Dkt. 2172] (the "MRHFM Objection").
 - G. The TCC Response.
 - H. The Debtor's Supplemental Response.
13. Aylstock, Witkin, Kreis & Overholtz, PLLC's Motion for Order Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2029].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2030].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2047].
- C. Supplemental Statement of Aylstock, Witkin, Kreis & Overholtz, PLLC in Support of Motion for an Order Regarding the Composition of the Official Committee of Talc Claimants [Dkt. 2131].

Objections Received:

- D. The UST Response.
 - E. The Debtor's Response.
 - F. The MRHFM Objection.
 - G. The TCC Response.
 - H. The Debtor's Supplemental Response.
14. Claimant Giovanni Sosa's Motion for an Order Appointing Mr. Sosa to the Official Committee of Talc Claimants [Dkt. 2041].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2042].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2048].
- C. Supplement to Motion of Giovanni Sosa for Consideration of His Appointment to the Official Committee of Talc Claimants [Dkt. 2134].
- D. Reply of Giovanni Sosa to the Response of Debtor LTL Management LLC [Dkt. 2209].

Objections Received:

- E. The UST Response.
- F. The Debtor's Response.

- G. The TCC Response.
- H. The Debtor's Supplemental Response.
- 15. Claimant Evan Plotkin's Motion for an Order Appointing Mr. Plotkin to the Official Committee of Talc Claimants [Dkt. 2043].

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Application for Order Shortening Time [Dkt. 2044].
- B. Order Shortening Time Period for Notice, Setting Hearing and Limiting Notice [Dkt. 2050].
- C. Supplement to Motion of Evan Plotkin for Consideration of His Appointment to the Official Committee of Talc Claimants [Dkt. 2136].

Objections Received:

- D. The UST Response.
- E. The Debtor's Response.
- F. The TCC Response.
- G. The Debtor's Supplemental Response.
- 16. Debtor's Second Motion for Entry of an Order Pursuant to 11 U.S.C. § 1121(d) Extending the Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof [Dkt. 2095] (the "Exclusivity Motion").

Status: This matter is going forward.

Objection Deadline: April 27, 2022

Related Documents:

- A. Debtor's Reply in Support of the Exclusivity Motion [Dkt. 2205].

Objections:

- B. The Official Committee of Talc Claimants' Objection to the Exclusivity Motion [Dkt. 2181].

Dated: May 3, 2022

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

Paul R. DeFilippo, Esq.

James N. Lawlor, Esq.

Joseph F. Pacelli, Esq. (*pro hac vice*)

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

pdefilippo@wmd-law.com

jlawlor@wmd-law.com

jpacelli@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.

Brad B. Erens, Esq.

Dan B. Prieto, Esq.

Amanda Rush, Esq.

2727 N. Harwood Street

Dallas, Texas 75201

Telephone: (214) 220-3939

Facsimile: (214) 969-5100

gmgordon@jonesday.com

bberens@jonesday.com

dbprieto@jonesday.com

asrush@jonesday.com

(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR